

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE TO AMERICAN POSTAL  
WORKERS UNION INTERROGATORY REDIRECTED FROM WITNESS NERI  
(APWU/USPS-T4-7(d))  
(January 12, 2012)**

The United States Postal Service hereby provides its response to the above-listed interrogatory from the American Postal Workers Union, redirected from witness Neri (USPS-T-4) and dated December 29, 2011. The question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY  
REDIRECTED FROM WITNESS NERI

**APWU/USPS-T4-7** On page 16 of your testimony you state “presorted First-Class Mail for a mail processing facility’s service area, entered by commercial mailers at co-located BMEU facilities (that is, BMEUs located at mail processing facilities) which meet the CAT at the co-located BMEU and the CET at the mail processing facility would be processed for the next day’s delivery.”

d) Is this exception to the normal delivery standards applicable to only certain customers’ First Class mail consistent with Title 39 §403 (c)?

**RESPONSE:**

The Postal Service believes that the content of the request and supporting testimony that it filed in PRC Docket No. N2012-1 is consistent with 39 U.S.C. § 403(c).